

**Remarks/Arguments:**

With the present amendment, claims 21-32 and 68-70 are pending. The Examiner is thanked for his efforts to translate Korean Patent Application 2001-51282 in order to attempt to substantiate a publication date for that reference.

**Claim rejections under 35 U.S.C. §112**

Claims 21-32 and 68-70 stand rejected under 35 U.S.C. §112, second paragraph.

Applicants have amended the claims to remove all references to the term "third" and have amended claim 70 to provide proper antecedent basis for "guide recess" in line 21. Applicants respectfully request reconsideration and allowance of claims 21-32 and 68-70.

**Claim rejections under 35 U.S.C. §102**

Claims 21, 25, and 27-32 stand rejected under 35 U.S.C. §102(b) as anticipated by Samsung Electronics Co. patent application KR-2001-0051282 ("the '282 reference"). Applicants respectfully traverse this rejection for the reasons set forth below.

In the Office Action dated July 25, 2006, the Office readily acknowledged Applicants' right to priority at least as early as April 1, 2002. The '282 reference was filed in Korea on August 24, 2001. In a telephone discussion with the undersigned on September 15, 2006, the Examiner acknowledged that the '282 reference does not include a publication date. Thus, the Office has failed to establish a *prima facie* case that this is a valid reference against the instant application.

Applicants respectfully submit that the '282 reference *was never published*, thus removing the '282 reference as prior art against the pending claims. Because the '282 reference is improper as a 35 U.S.C. §102(b) reference, Applicants respectfully submit that claim 21 is patentable over the cited prior art. Applicants respectfully request therefore reconsideration and allowance of claim 21.

Claims 25 and 27-32 depend from claim 21, and Applicants respectfully submit that claims 25 and 27-32 are likewise patentable over the '282 reference for at least the same reasons as set forth above with respect to claim 21. Applicants respectfully request therefore reconsideration and allowance of claims 25 and 27-32.

**Claim rejections under 35 U.S.C. §103**

Claims 22-24, and 70 stand rejected under 35 U.S.C. §103(a) as being unpatentable over the '282 reference in view of Tamamitsu et al., JP-2001-319833. Claim 26 stands rejected under 35 U.S.C. §103(a) as being unpatentable over the '282 reference in view of Steinhoff et al., U.S. Patent No. 6,088,240. Claims 68 and 69 stand rejected under 35 U.S.C. §103(a) as being unpatentable over the '282 reference in view of Arakawa et al., U.S. Patent Application Publication No. 2003/0162569. Applicants respectfully traverse these rejections for the reasons set forth below.

As discussed above, the '282 reference is improperly relied upon as a prior art reference and should be removed as such. Further, the Office has failed to establish that any of the secondary references disclose or suggest the remaining elements of applicants claims that would arguably be supported by the '282 reference. Consequently, Applicants respectfully submit that claims 22-24, 26, and 68-70 are patentable over the cited prior art for at least the same reasons as set forth above with respect to claims 21, 25, and 27-32. Applicants therefore respectfully request reconsideration and allowance of claims 22-24, 26, and 68-70.

Appln. No.: 10/506,865  
Amendment Dated September 22, 2006  
Reply to Office Action of July 25, 2006

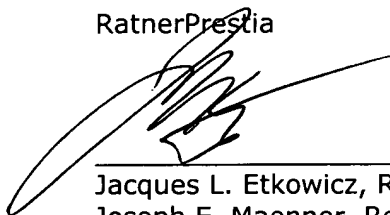
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### Conclusion

In view of the above amendments and arguments, Applicants respectfully submit that the present application is in condition for allowance. Prompt reconsideration and allowance is respectfully requested. The Examiner is invited to call applicants' representatives if necessary to expedite prosecution and allowance of this application.

Respectfully submitted,

RatnerPrestia



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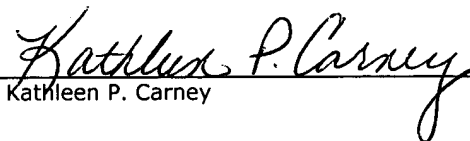
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Dated: September 22, 2006

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The Director is hereby authorized to charge or credit Deposit Account No. **18-0350** for any additional fees, or any underpayment or credit for overpayment in connection herewith.

I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail, with sufficient postage, in an envelope addressed to: Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450 on September 22, 2006.



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